

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS NURSES  
ASSOCIATION,

Plaintiff,

v.

NATIONAL NURSES UNITED, AFL-CIO

Defendant

Civil Action No. 15-11804

**PLAINTIFF’S RULE 21 MOTION TO ADD PARTY PLAINTIFF**

The plaintiff Massachusetts Nurses Association (MNA) moves the Court, pursuant to FRCP 21, to add as a party plaintiff the District of Columbia Nurses Association (“DCNA”). As grounds for this motion, the MNA states that the lawsuit seeks a declaration that an action taken by the board of directors of the defendant National Nurses Union – to wit, that a contract entitled “Agreement for Consolidation and Affiliation” (“ACA”) is null and void (“the Action”) – is a breach of the ACA. The DCNA – the party sought to be added - is not only a party to the ACA, but it has also sustained an injury by virtue of the Action, as described in paragraph 15 of the plaintiff’s complaint.

In further support of its motion, the MNA states that a) the DCNA assents to the allowance of this motion and b) the defendant NNU does not oppose its allowance.

Respectfully submitted,

For the Plaintiff,

Massachusetts Nurses Association,

By its attorneys,

/s/ James F. Lamond

James F. Lamond, BBO #544817  
McDonald Lamond Canzoneri  
352 Turnpike Road, Suite 310  
Southborough, MA 01772-1756  
(508) 485-6600  
[jlamond@masslaborlawyers.com](mailto:jlamond@masslaborlawyers.com)

Date: July 16, 2015

#### **CERTIFICATE OF SERVICE AND LOCAL RULE 15.1 CERTIFICATE**

I, James F. Lamond, hereby certify that a) I have this day by the Electronic Case File system and PDF Email ([manderson@murphypllc.com](mailto:manderson@murphypllc.com)) served a copy of the foregoing Plaintiff's Rule 21 Motion To Add Party Plaintiff upon Michael T. Anderson Murphy Anderson PLLC 111 Devonshire St. 5th Floor, Boston, Massachusetts 02109; and b) that the motion was served in advance on the new party as required by Local Rule 15.1.

Dated: July 16, 2015

/s/ James F. Lamond

James F. Lamond